

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE	)	
	)	Chapter 11
ALEXANDER E. JONES	)	
	)	Case No. 22-33553 (CML)
DEBTOR.	)	
	)	
	)	

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO APPLICATION TO  
EMPLOY BROKER TO ASSIST IN THE SALE OF FM 621**

1. On January 30, 2024, Alexander E. Jones (“Debtor”), debtor and debtor-in-possession in the above-captioned Chapter 11 Case, filed his *Application to Employ Broker to Assist in the Sale of FM 621* [Doc. No. 592] (the “Application”).

2. The deadline for parties to file objections and responses to the Application was February 20, 2024 (the “Objection Deadline”). No objections or responses to the Application were filed on the docket on or before the Objection Deadline. Counsel to the Debtor did not receive any other informal responses on or before the Objection Deadline.

3. The Debtor hereby respectfully requests that the Court enter the proposed order on the Application, attached as Exhibit A, at the earliest convenience of the Court.

Dated: February 26, 2024.

**CROWE & DUNLEVY, P.C.**

By: /s/ Christina W. Stephenson

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**ATTORNEYS FOR DEBTOR ALEXANDER E.  
JONES**

**EXHIBIT A**

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>ALEXANDER E. JONES,</b>  <b>Debtor.</b>	§ § § § § § §	<b>Chapter 11</b>  <b>Case No. 22-33553</b>
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**ORDER GRANTING DEBTOR’S APPLICATION TO EMPLOY BROKER  
TO ASSIST IN THE SALE OF FM 621**

ON THIS DATE, this Court considered Debtor’s *Application to Employ Broker to Assist in the Sale of FM 621* (the “Application”) filed by the above-captioned debtor and debtor-in-possession (the “Debtor”) for the entry of an order (the “Order”) authorizing Debtor to retain and employ Century 21 The Hills Realty as its real estate broker, pursuant to Sections 105(a), 327, and 1107 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2014-1 of the Local Bankruptcy Rules for the Southern District of Texas (the “Local Rules”). Upon review of the Application and the Declaration of Randy Schriewer (the “Schriewer Declaration”), the Court finds that it has jurisdiction to grant the relief requested in the Application pursuant to 28 U.S.C. §§ 1334 and 157(b)(2).

The Court further finds that due and adequate notice of the Application was served via the court’s electronic transmission facilities and United States First Class Mail upon all necessary parties.

The Court further finds that Century 21 The Hills Realty does not represent or hold any interest adverse to the Debtor or to the estate with respect to the matter on which it is to be employed in this Chapter 11 Case pursuant to 11 U.S.C. § 327(e).

**IT IS THEREFORE,**

**ORDERED** that the Application is hereby **GRANTED**; and it is further

**ORDERED** that the Debtor is authorized to employ and retain Century 21 The Hills Realty as real estate broker; it is further

**ORDERED** that Century 21 The Hills Realty shall be compensated in accordance with procedures set forth in the Application and such procedures as may be fixed by order of this Court.

Dated: \_\_\_\_\_, 2024

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**UNITED STATES BANKRUPTCY JUDGE**